



**DR. THOMAS E. HOLDEN**  
Mayor

**OFFICE OF THE MAYOR**  
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March 17, 2010

Mr. Mark Cowin, Director  
California Department of Water Resources  
P.O. Box 942836, Room 1115-1  
Sacramento, CA 94236-0001

Dear Mr. Cowin:

The City of Oxnard appreciates the opportunity to provide comments as the Department of Water Resources works to implement the 2009 Water Conservation Act (SB x 7-7), which requires the State to achieve a 20% reduction in urban per capita water use by December 31, 2020. The City of Oxnard is an urban water retailer with over 40,000 service connections. As written, SB x 7-7 places the burden of responsibility for reducing the State's overall per capita water use on retail water suppliers under the assumption that if each individual water retailer is able to reduce their per capita water use by 20%, the State as a whole will reach its water use reduction goals. As the City begins to plan its strategy for complying with the regulation and helping the State achieve its water use reduction goals, the City offers the following comments and recommendations:

- Ensure that the compliance and reporting requirements for SB x 7-7 mirror those already established by the California Urban Water Conservation Council (CUWCC). As a member of the CUWCC, the city reports on its water conservation efforts every 2 years. The same programs implemented to meet CUWCC requirements will help cities meet the water use reduction requirements outlined in SB x 7-7. Congruent, integrated reporting requirements will allow cities to spend more time and resources on implementation and actual water savings achievements and less time on reporting.
- Ensure that flexibility is built into the definition of service area population used to calculate per capita water use baselines, targets and compliance year adjustments. Beyond population data provided by the census and the California Department of Finance, many verifiable, local sources of population data are available that may be a more accurate source of water agency service area populations. In Ventura County local cities have developed a population forecast through the year 2040 specific to local County data.
- Because the burden of urban water supplier compliance falls primarily at the local retail level, please consider providing special consideration for retail level water agencies in upcoming grant funding opportunities geared to help agencies increase water conservation efforts and meet water use reduction goals.

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- Ensure that water suppliers will not be required to switch target methodologies in the future if the State finds that it is not meeting its overall water use reduction goals. Water agencies are investing a lot of effort in determining which of the four methodologies will allow them to reduce water use by 20% in the most cost efficient and feasible way possible. Once a methodology is committed and adhered to, agencies should not be required to change their compliance strategy moving forward.

We appreciate the opportunity to comment as the Department of Water Resources begins to implement SB x 7-7. We look forward to participating as the process moves forward.

Sincerely,

A handwritten signature in dark ink, appearing to read "Thomas Holden", with a stylized flourish at the end.

Dr. Thomas E. Holden  
Mayor

